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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2017 Grand Jury

17CR00505-RGK

UNITED STATES OF AMERICA,

CR No.

Plaintiff,

I N D I C T M E N T

v.

TURHAN LEMONT ARMSTRONG,
aka "T,"
aka "Turhan Lemont Walker,"
aka "Emmett Louis,"
aka "Kent Warden,"
aka "Bob Jimenez,"
aka "Terrence," and
FNU LNU
aka "Mike,"
aka "Mounir,"

[18 U.S.C. § 1349: Conspiracy to
Commit Financial Institution
Fraud; 18 U.S.C. § 1344(1):
Financial Institution Fraud; 18
U.S.C. § 1014: False Statement to
Financial Institution; 18 U.S.C.
§ 1956(h): Conspiracy to Engage in
Money Laundering; 18 U.S.C.
§ 1956(a)(1)(B)(i): Money
Laundering; 18 U.S.C. § 1957:
Engaging in Monetary Transactions
in Property Derived from Specified
Unlawful Activity; 18 U.S.C.
§ 1028A(a)(1): Aggravated Identity
Theft; 18 U.S.C. §§ 981(a)(1)(C),
982(a)(1), 982(a)(2), 1028(b)(5)
and 28 U.S.C. § 2461(c): Criminal
Forfeiture]

Defendants.

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At all times relevant to this Indictment:

1. Mission Federal Credit Union was a federally-insured
financial institution, the deposits of which were insured by the
National Credit Union Administration ("NCUA").

1 2. BMW Bank of North America was a federally-insured financial
2 institution, the deposits of which were insured by the Federal
3 Deposit Insurance Corporation ("FDIC").

4 3. USC Credit Union was a federally-insured financial
5 institution, the deposits of which were insured by the NCUA.

6 4. State Farm Bank was a federally-insured financial
7 institution, the deposits of which were insured by the FDIC.

8 5. US Bank was a federally-insured financial institution, the
9 deposits of which were insured by the FDIC.

10 6. Altura Credit Union was a federally-insured financial
11 institution, the deposits of which were insured by the NCUA.

12 7. JP Morgan Chase Bank was a federally-insured financial
13 institution, the deposits of which were insured by the FDIC.

14 8. Chase Bank, N.A., was a federally-insured financial
15 institution, the deposits of which were insured by the FDIC.

16 9. Pen Air Federal Credit Union was a federally-insured
17 financial institution, the deposits of which were insured by the
18 NCUA.

19 10. Pentagon Federal Credit Union was a federally-insured
20 financial institution, the deposits of which were insured by the
21 NCUA.

22 11. Navy Federal Credit Union was a federally-insured financial
23 institution, the deposits of which were insured by the NCUA.

24 12. Wells Fargo Bank, N.A., was a federally-insured financial
25 institution, the deposits of which were insured by the FDIC.

26 13. United Services Automobile Association ("USAA") was a
27 federally-insured financial institution, the deposits of which were
28 insured by the FDIC.

1 14. Bank of the West was a federally-insured financial
2 institution, the deposits of which were insured by the FDIC.

3 15. Merchants Bank of California, N.A., was a federally-insured
4 financial institution, the deposits of which were then insured by the
5 FDIC.

6 16. Wilshire Bank, N.A., was a federally-insured financial
7 institution, the deposits of which were then insured by the FDIC.

8 17. Bank of America, N.A., was a federally-insured financial
9 institution, the deposits of which were insured by the FDIC.

10 18. These Introductory Allegations are hereby incorporated by
11 reference into Counts One through Forty of this Indictment as though
12 set forth fully therein.

COUNT ONE

[18 U.S.C. § 1349]

A. OBJECT OF THE CONSPIRACY

Beginning on a date unknown and continuing to on or about August 9, 2017, in Los Angeles, Orange, and Riverside Counties, within the Central District of California, and elsewhere, defendants TURHAN LEMONT ARMSTRONG, also known as ("aka") "T," aka "Turhan Lemont Walker," aka "Emmett Louis," aka "Kent Warden," aka "Bob Jimenez," aka "Terrence" ("ARMSTRONG"), and FNU LNU, aka "Mike," aka "Mounir," ("MIKE"), together with co-conspirators Chang Lee ("Lee"), Hyunwook Cho ("Cho"), Joseph Khalil ("Khalil"), Antonio Bugatti ("Bugatti"), and others known and unknown to the Grand Jury, conspired and agreed with each other, knowingly and with intent to defraud, to devise, execute, and attempt to execute a scheme to defraud financial institutions as to material matters, in violation of Title 18, United States Code, Section 1344.

B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE ACCOMPLISHED

The object of the conspiracy was to be accomplished, in substance, as follows:

1. Defendant ARMSTRONG would oversee and control a conspiracy to defraud financial institutions through the submission of car loan applications containing false information, such as fake identity, employment, and income information.

2. Defendants ARMSTRONG and MIKE would select financial institutions from which to fraudulently apply for car loans (the "financial institutions") and car dealerships from which to fraudulently purchase, or fraudulently obtain credit to lease, cars.

1 3. Defendants ARMSTRONG and MIKE would supply co-conspirators
2 Lee and Bugatti, and others known and unknown to the Grand Jury, with
3 false information to provide to the financial institutions in
4 applying for car loans or purchasing cars.

5 4. Defendant ARMSTRONG would transport co-conspirator Bugatti,
6 and others known and unknown to the Grand Jury, to the financial
7 institutions.

8 5. Defendant ARMSTRONG, and co-conspirators Lee, Cho, and
9 Bugatti, and others known and unknown to the Grand Jury, to
10 fraudulently obtain cars or car loans, would knowingly submit to the
11 financial institutions documents containing material misstatements,
12 such as falsely identifying the applicant's name, social security
13 number, employment status, income, or the vehicle that the loan
14 purportedly was being used to purchase.

15 6. Defendants ARMSTRONG and MIKE, co-conspirators Lee, Cho,
16 and Khalil, and others known and unknown to the Grand Jury, would
17 either take possession of the vehicle, or, if no car had been
18 purchased, take possession of the loan money that had been disbursed.

19 7. After the financial institutions funded the car loans,
20 defendants ARMSTRONG and MIKE, and others known and unknown to the
21 Grand Jury, would make initial payments on the loans to delay
22 exposure of the scheme, and would then cease making further payments.

23 8. Co-conspirator Khalil, using co-conspirator Bugatti's
24 identity information, would receive correspondence from the financial
25 institutions, which he would provide to defendant ARMSTRONG.

26 C. OVERT ACTS

27 In furtherance of the conspiracy, and to accomplish its object,
28 defendants ARMSTRONG and MIKE and co-conspirators Lee, Cho, Khalil,

1 and Bugatti, together with others known and unknown to the Grand
2 Jury, on or about the following dates, committed and caused to be
3 committed various overt acts, in the Central District of California
4 and elsewhere, including, but not limited to, the following:

5 1. On June 19, 2009, defendant ARMSTRONG caused an unindicted
6 co-conspirator to submit an application for a \$50,000 loan to Mission
7 Federal Credit Union using false information that had been supplied
8 to the co-conspirator by defendant ARMSTRONG.

9 2. On March 23, 2011, defendants ARMSTRONG and MIKE caused
10 bank account number xxxxxx7792 to be opened with Wells Fargo Bank,
11 N.A., under the name "Kevin M. Rios" (the "Kevin Rios account"),
12 listing social security number XXX-XX-5640.

13 3. On a date unknown, but no later than April 18, 2011,
14 defendant ARMSTRONG provided co-conspirator Lee with social security
15 numbers ("SSNs") to be used to fraudulently obtain cars and car loans
16 and counseled co-conspirator Lee on how to fraudulently obtain the
17 cars and car loans.

18 4. On a date unknown, but no later than September 6, 2013, co-
19 conspirator Lee informed co-conspirator Cho that defendant ARMSTRONG
20 had provided him with SSNs belonging to real individuals that would
21 enable co-conspirators Lee and Cho to fraudulently obtain cars and
22 car loans.

23 5. On April 18, 2011, using identity information supplied by
24 defendant ARMSTRONG, co-conspirator Cho falsely represented SSN XXX-
25 XX-8722 to be his own when applying for a loan from Pentagon Federal
26 Credit Union for the purchase of a Mercedes Benz C300.

27 6. On September 4, 2011, using identity information supplied
28 by defendant ARMSTRONG, co-conspirator Lee falsely represented SSN

1 XXX-XX-1732 to be his own and provided a false California driver's
2 license when purchasing a 2011 Nissan Maxima from a car dealership in
3 Buena Park, California.

4 7. On September 5, 2011, using identity information supplied
5 by defendant ARMSTRONG, co-conspirator Lee falsely represented SSN
6 XXX-XX-1732 to be his own and provided a false California driver's
7 license when purchasing a 2010 Mercedes Benz C300 from a car
8 dealership in Buena Park, California.

9 8. On September 5, 2011, using identity information supplied
10 by defendant ARMSTRONG, co-conspirator Lee falsely represented SSN
11 XXX-XX-1732 to be his own and provided a false California driver's
12 license when purchasing a 2009 Mercedes Benz C300 from a car
13 dealership in Los Angeles, California.

14 9. On September 7, 2011, using identity information supplied
15 by defendant ARMSTRONG, co-conspirator Lee falsely represented SSN
16 XXX-XX-1732 to be his own and provided a false California driver's
17 license when purchasing a 2009 Audi A4 from a car dealership in Los
18 Angeles, California.

19 10. On May 4, 2012, using identity information supplied by
20 defendant ARMSTRONG, co-conspirator Lee falsely represented SSN XXX-
21 XX-4193 to be his own when applying for a credit card account from
22 Chase Bank, N.A.

23 11. On June 6, 2012, using identity information supplied by
24 defendant ARMSTRONG, co-conspirator Lee falsely represented SSN XXX-
25 XX-4193 to be his own and provided a false California driver's
26 license number when applying for a credit card account from Pen Air
27 Federal Credit Union.

1 12. On July 2, 2012, defendant ARMSTRONG caused a Consumer
2 Credit Application to be submitted to obtain a \$59,952.15 car loan
3 from BMW Bank of North America on behalf of Park Avenue Motors
4 Corporation, which contained false information that had been supplied
5 by defendant ARMSTRONG, including a false name, employer, and
6 employer address.

7 13. On July 13, 2012, using identity information supplied by
8 defendant ARMSTRONG, co-conspirator Lee falsely represented SSN XXX-
9 XX-4193 to be his own and provided a false California driver's
10 license number when applying for a loan from Pen Air Federal Credit
11 Union for the purchase of a 2008 Mercury.

12 14. On July 18, 2012, defendant ARMSTRONG caused a Promissory
13 Note and Security Agreement to be submitted to obtain a \$30,000 car
14 loan from State Farm Bank on behalf of Master Auto Sales, which
15 contained false information that had been supplied by defendant
16 ARMSTRONG, including a false name, employer, and address.

17 15. On July 25, 2012, using co-conspirator Bugatti's name, co-
18 conspirator Khalil executed an application to rent a residence on
19 12215 Zelzah Avenue, Granada Hills, California where co-conspirator
20 Khalil would receive correspondence from defrauded financial
21 institutions.

22 16. On August 7, 2012, defendants ARMSTRONG and MIKE caused
23 bank account number xxxxxxxx4937 (the "Master Auto Sales account") to
24 be opened with Bank of America, N.A., on behalf of business "Master
25 Auto Sales, LLC," under the name "Kent Warden."

26 17. On August 23, 2012, defendants ARMSTRONG and MIKE caused
27 bank accounts xxxxxx3677 and xxxxxx5513 to be opened with Wells Fargo
28

1 Bank, N.A., on behalf of business "Krystal Royal Motors," listing
2 taxpayer identification number 45-5560215.

3 18. On August 27, 2012, defendant ARMSTRONG caused a Promissory
4 Note and Security Agreement that contained false information supplied
5 by defendant ARMSTRONG, including information concerning a vehicle
6 that had not actually been purchased, to be submitted to State Farm
7 Bank in order to obtain a \$40,000 car loan on behalf of Master Auto
8 Sales.

9 19. On August 28, 2012, using identity information supplied by
10 defendant ARMSTRONG, co-conspirator Cho falsely represented SSN XXX-
11 XX-4865 to be his own and provided a false California driver's
12 license when applying for an individual/member account with Pen Air
13 Federal Credit Union.

14 20. On September 8, 2012, using identity information supplied
15 by defendant ARMSTRONG, co-conspirator Cho falsely represented SSN
16 XXX-XX-4865 to be his own and provided a false California driver's
17 license when purchasing a 2008 BMW 550i from a car dealership in
18 Irvine, California.

19 21. On September 10, 2012, using identity information supplied
20 by defendant ARMSTRONG, co-conspirator Cho falsely represented SSN
21 XXX-XX-4865 to be his own and provided a false California driver's
22 license when purchasing a 2008 Lexus GX470 from a car dealership in
23 Santa Clarita, California.

24 22. On September 18, 2012, defendant ARMSTRONG caused a
25 Promissory Note and Security Agreement that contained false
26 information that had been supplied by defendant ARMSTRONG, including
27 information concerning a vehicle that had not actually been
28

1 purchased, to be submitted to State Farm Bank in order to obtain a
2 \$40,000 car loan from State Farm Bank on behalf of Master Auto Sales.

3 23. On September 27, 2012, using identity information supplied
4 by defendant ARMSTRONG, co-conspirator Cho falsely represented SSN
5 XXX-XX-4865 to be his own and provided a false California driver's
6 license when purchasing a 2009 Acura MDX and 2013 Mitsubishi Lancer
7 from a car dealership in Costa Mesa, California.

8 24. On a date unknown, but no later than October 8, 2012,
9 defendants ARMSTRONG and MIKE, and co-conspirator Khalil, arranged
10 for co-conspirator Bugatti to travel from Taipei, Taiwan, to Los
11 Angeles, California, so that co-conspirator Bugatti could
12 fraudulently apply for car loans in the United States.

13 25. On October 8, 2012, co-conspirator Khalil emailed co-
14 conspirator Bugatti a flight itinerary for round-trip travel from
15 Taipei, Taiwan, to Los Angeles, California.

16 26. On November 8, 2012, at the direction of defendant
17 ARMSTRONG, co-conspirator Bugatti applied to open an account with USC
18 Credit Union using false information that had been supplied to him by
19 defendant ARMSTRONG, including a false employer, employer address,
20 and income.

21 27. On November 9, 2012, defendant ARMSTRONG caused the
22 business "Krystal Royal Motors, LLC" to be incorporated as a domestic
23 limited liability company in the state of Georgia.

24 28. On November 12, 2012, at the direction of defendant
25 ARMSTRONG, co-conspirator Bugatti applied for a \$109,358.79 car loan
26 from BMW Bank of North America on behalf of Park Avenue Motors
27 Corporation using false information that had been supplied to him by
28

1 defendant ARMSTRONG, including a false employer, employer address,
2 and income.

3 29. On November 16, 2012, at the direction of defendant
4 ARMSTRONG, co-conspirator Bugatti applied for a \$50,000 car loan from
5 State Farm Bank on behalf of Krystal Royal Motors using false
6 information that had been supplied to him by defendant ARMSTRONG,
7 including a false employer, employer address, and income.

8 30. On November 16, 2012, at the direction of defendant
9 ARMSTRONG, co-conspirator Bugatti applied for a \$50,000 loan from USC
10 Credit Union on behalf of Krystal Royal Motors for the purchase of a
11 2011 Lexus GX 460 Premium using false information that had been
12 supplied to him by defendant ARMSTRONG, including a false employer,
13 employer address, and income.

14 31. On November 19, 2012, at the direction of defendant
15 ARMSTRONG, co-conspirator Bugatti requested that USC Credit Union
16 apply the \$50,000 loan for the purchase of a 2011 Lexus GX 460
17 Premium to the purchase of a 2011 Porsche Panamera, with a Vehicle
18 Identification Number ("VIN") ending in -0187, from Krystal Royal
19 Motors.

20 32. On November 19, 2012, at the direction of defendant
21 ARMSTRONG, co-conspirator Bugatti applied for a \$50,000 loan from US
22 Bank on behalf of Krystal Royal Motors using false information that
23 had been supplied to him by defendant ARMSTRONG, including a false
24 employer, employer address, and income.

25 33. On November 21, 2012, at the direction of defendant
26 ARMSTRONG, co-conspirator Bugatti applied for a \$50,000 loan from
27 Altura Credit Union on behalf of Krystal Royal Motors using false
28

1 information that had been supplied to him by defendant ARMSTRONG,
2 including a false employer, employer address, and income.

3 34. On November 27, 2012, at the direction of defendant
4 ARMSTRONG, co-conspirator Bugatti applied for a \$50,000 loan from JP
5 Morgan Chase Bank on behalf of Krystal Royal Motors using false
6 information that had been supplied to him by defendant ARMSTRONG,
7 including a false address and vehicle purchased.

8 35. On November 28, 2012, at the direction of defendant
9 ARMSTRONG, co-conspirator Bugatti applied for a \$51,750.04 loan from
10 TD Auto Finance LLC on behalf of Pedder Nissan using false
11 information that had been supplied to him by defendant ARMSTRONG,
12 including a false employer and income.

13 36. On about November 28, 2012, at the direction of defendant
14 ARMSTRONG, co-conspirator Bugatti applied for a \$57,999.14 loan from
15 Pen Air Federal Credit Union on behalf of Hornburg Jaguar/Landrover
16 using false information that had been supplied to him by defendant
17 ARMSTRONG, including a false employer and income.

18 37. On November 28, 2012, at the direction of defendant
19 ARMSTRONG, co-conspirator Bugatti applied for a \$47,211 loan from VW
20 Credit Leasing Ltd. on behalf of Keyes Audi using false information
21 that had been supplied to him by defendant ARMSTRONG, including a
22 false employer, address, and income.

23 38. On January 9, 2013, defendants ARMSTRONG and MIKE knowingly
24 caused a payment of \$9,745, drawn on an account with insufficient
25 funds, to be deposited into a JP Morgan Chase Bank account number
26 xxxxxxxxxxxx1646 in the name of co-conspirator Bugatti.

27 39. On January 9, 2013, defendants ARMSTRONG and MIKE knowingly
28 caused a payment of \$3,900.82, drawn on an account with insufficient

1 funds, to be deposited into a JP Morgan Chase Bank account
2 xxxxxxxxxxxxxx8083 in the name of co-conspirator Bugatti.

3 40. On January 9, 2013, defendants ARMSTRONG and MIKE knowingly
4 caused a check of \$15,500, drawn on an account with insufficient
5 funds, to be deposited into a Nordstrom Bank account in the name of
6 co-conspirator Bugatti.

7 41. On January 10, 2013, defendants ARMSTRONG and MIKE
8 knowingly caused a check of \$7,983.40, drawn on an account that had
9 been closed, to be deposited into a Bank of the West account in the
10 name of co-conspirator Bugatti.

11 42. On January 12, 2013, defendants ARMSTRONG and MIKE
12 knowingly attempted to cause a check of \$15,000 to be deposited into
13 a Bank of America, N.A., account in the name of co-conspirator
14 Bugatti.

15 43. On January 12, 2013, defendants ARMSTRONG and MIKE
16 knowingly attempted to cause a check of \$9,979.70 to be deposited
17 into a Citi Business credit card account belonging to co-conspirator
18 Bugatti.

19 44. On January 15, 2013, defendants ARMSTRONG and MIKE
20 knowingly caused a check of \$8,450, drawn on an account that had been
21 closed, to be deposited into a Citi Business credit card account
22 belonging to co-conspirator Bugatti.

23 45. On August 1, 2013, defendants ARMSTRONG and MIKE caused
24 bank account xxxxxx7022 to be opened with Wells Fargo Bank, N.A.,
25 under the name "Ely Moore," listing social security number XXX-XX-
26 9992.

1 46. On November 28, 2013, defendant ARMSTRONG provided co-
2 conspirator Bugatti with \$5,000 in cash to assist co-conspirator
3 Bugatti in leaving the United States.

4 47. On September 3, 2014, defendants ARMSTRONG and MIKE caused
5 bank account xxxxxx5601 to be opened with Wells Fargo Bank, N.A.,
6 under the name "Tracy Lang," listing social security number XXX-XX-
7 2245.

8 48. On September 9, 2014, defendant ARMSTRONG submitted a
9 signature card to JP Morgan Chase Bank on which defendant ARMSTRONG
10 falsely represented his name to be "Bob Jimenez" and his social
11 security number to end -8422.

12 49. On September 17, 2014, defendant ARMSTRONG submitted a
13 membership application to Navy Federal Credit Union in which
14 defendant ARMSTRONG falsely represented his name to be "Bob Jimenez,"
15 his social security number to end -8422, his date of birth to be
16 September 9, 1975, and his employer for the previous five years and
17 three months to have been TecTrue.

18 50. On September 19, 2014, defendant ARMSTRONG used false
19 information, including a false name, to obtain a \$50,000 loan from
20 USAA in the name of Bob Jimenez on behalf of Kevin Rios.

21 51. On September 19, 2014, defendant ARMSTRONG used false
22 information, including a false name, to obtain a \$55,000 loan from
23 Navy Federal Credit Union in the name of Bob Jimenez on behalf of Bob
24 Jimenez and Ely Moore.

25 52. On September 20, 2014, defendant ARMSTRONG used false
26 information, including a false name, to obtain credit for a lease of
27 a 2015 Audi A7 from VW Credit Leasing Ltd.

1 53. On September 22, 2014, defendant ARMSTRONG used false
2 information, including a false name, to obtain credit for a lease of
3 a 2015 Mercedes-Benz S550V from Mercedes Benz of Delray.

4 54. On September 22, 2014, defendant ARMSTRONG used false
5 information, including a false name, to obtain credit for a lease of
6 a 2014 Lexus LS 460 from Lexus Financial Services.

7 55. On September 24, 2014, defendant ARMSTRONG used false
8 information, including a false name, to obtain credit for a lease of
9 a 2015 Cadillac Escalade from GM Financial.

10 56. On September 29, 2014, defendant ARMSTRONG used false
11 information, including a false name, to obtain a \$50,000 loan from
12 Pentagon Federal Credit Union in the name of Bob Jimenez on behalf of
13 Tracy Lang and Bob Jimenez.

COUNTS TWO THROUGH TEN

[18 U.S.C. § 1344(1)]

A. THE SCHEME TO DEFRAUD

1. Beginning on a date unknown and continuing to on or about August 9, 2017, in Los Angeles and Riverside Counties, within the Central District of California, TURHAN LEMONT ARMSTRONG, also known as ("aka") "T," aka "Turner Lemont Walker," aka "Emmett Louis," aka "Kent Warden," aka "Bob Jimenez," aka "Terrence" ("ARMSTRONG"), and FNU LNU, aka "Mike," aka "Mounir," ("MIKE"), together with co-conspirators Joseph Khalil ("Khalil") and Antonio Bugatti ("Bugatti"), and others known and unknown to the Grand Jury, knowingly and with intent to defraud, executed, and attempted to execute, a scheme to defraud financial institutions as to material matters.

2. The fraudulent scheme operated, in substance, in the manner described in Section B of Count One of this Indictment, which the Grand Jury hereby incorporates as though set forth fully herein.

B. THE EXECUTIONS OF THE FRAUDULENT SCHEME

3. On or about the following dates, in Los Angeles and Riverside Counties, within the Central District of California, and elsewhere, defendants ARMSTRONG and MIKE, co-conspirators Khalil and Bugatti, together with others known and unknown to the Grand Jury, committed the following acts, each of which constituted an execution of the fraudulent scheme:

COUNT	DATE	VICTIM FINANCIAL INSTITUTION	ACT
TWO	7/18/2012	State Farm Bank	Application for \$30,000 loan to purchase a 2010 Lexus RX350 from Master Auto Sales

THREE	8/27/2012	State Farm Bank	Application for \$40,000 loan to purchase a 2011 Infiniti QX56 from Master Auto Sales
FOUR	9/18/2012	State Farm Bank	Application for \$40,000 loan to purchase a 2011 Infiniti QX56 from Master Auto Sales
FIVE	11/16/2012	USC Credit Union	Application for \$50,000 loan to purchase a 2011 Lexus GX 460 Premium from Krystal Royal Motors
SIX	11/16/2012	State Farm Bank	Application for \$50,000 loan to purchase a 2008 Mercedes-Benz S Class Sedan from Krystal Royal Motors
SEVEN	11/19/2012	USC Credit Union	Application for \$50,000 loan to purchase a 2011 Porsche Panamera from Krystal Royal Motors
EIGHT	11/19/2012	US Bank	Application for a \$50,000 loan to purchase a 2012 Mercedes Benz 550 from Krystal Royal Motors
NINE	11/21/2012	Altura Credit Union	Application for \$50,000 loan to purchase a 2011 Infiniti QX56 from Krystal Royal Motors
TEN	11/27/2012	JP Morgan Chase Bank	Application for \$50,000 loan to purchase a 2008 Mercedes-Benz S Class Sedan from Krystal Royal Motors

COUNTS ELEVEN THROUGH THIRTEEN

[18 U.S.C. § 1014; 18 U.S.C. § 2(a)]

On or about the dates set forth below, in Los Angeles County, within the Central District of California, defendants TURHAN LEMONT ARMSTRONG, also known as ("aka") "T," aka "Turner Lemont Walker," aka "Emmett Louis," aka "Kent Warden," aka "Bob Jimenez," aka "Terrence," and FNU LNU, aka "Mike," aka "Mounir," together with co-conspirator Antonio Bugatti ("Bugatti"), and others known and unknown to the Grand Jury, each aiding and abetting the others, knowingly made and caused to be made false statements for the purpose of influencing the actions of a financial institution, namely, USC Credit Union, in connection with applications to obtain a \$50,000 loan on behalf of Krystal Royal Motors, as specifically described below:

COUNT	DATE	DOCUMENT	FALSE STATEMENT(S)
ELEVEN	11/8/2012	Application to open new account with USC Credit Union	Co-conspirator Bugatti falsely stated that co-conspirator Bugatti was employed by Intelligence Firm Tech, that co-conspirator Bugatti earned a monthly salary of \$11,000 from Intelligence Firm Tech, that Intelligence Firm Tech was located at 14416 Victory Blvd., Van Nuys, California, and that co-conspirator Bugatti had worked at Intelligence Firm Tech for six years and nine months
TWELVE	11/16/2012	Loan application to purchase a 2011 Lexus GX 460 Premium	Co-conspirator Bugatti falsely stated that co-conspirator Bugatti was employed by Intelligence Firm Tech, that co-conspirator Bugatti earned a monthly salary of \$11,000 from Intelligence Firm Tech, and that co-conspirator Bugatti had worked at Intelligence Firm

			Tech for more than six years
THIRTEEN	11/19/2012	Loan application to purchase a 2011 Porsche Panamera	Co-conspirator Bugatti falsely stated that co-conspirator Bugatti was purchasing a 2011 Porsche Panamera with a Vehicle Identification Number ending in -0187

COUNT FOURTEEN

[18 U.S.C. § 1014]

On or about November 16, 2012, in Los Angeles County, within the Central District of California, defendants TURHAN LEMONT ARMSTRONG, also known as ("aka") "T," aka "Turner Lemont Walker," aka "Emmett Louis," aka "Kent Warden," aka "Bob Jimenez," aka "Terrence" ("ARMSTRONG"), and FNU LNU, aka "Mike," aka "Mounir," ("MIKE"), together with co-conspirator Antonio Bugatti ("Bugatti"), and others known and unknown to the Grand Jury, knowingly made and caused to be made false statements for the purpose of influencing the actions of a financial institution, namely, State Farm Bank, in connection with an application to obtain a \$50,000 loan on behalf of Krystal Royal Motors, to wit: defendants ARMSTRONG and MIKE and co-conspirator Bugatti submitted and caused to be submitted to State Farm Bank a vehicle loan application and accompanying documents that represented (1) that co-conspirator Bugatti was employed by Intelligence Firm Tech, (2) that co-conspirator Bugatti earned a monthly salary of \$11,000 from Intelligence Firm Tech, (3) that Intelligence Firm Tech was located at 14416 Victory Blvd., Van Nuys, California, (4) that co-conspirator Bugatti had worked at Intelligence Firm Tech for six years and nine months, and (5) that the loan would fund co-conspirator Bugatti's purchase of a 2008 Mercedes-Benz S Class Sedan, when in truth and in fact, as defendants ARMSTRONG and MIKE and co-conspirator Bugatti then well knew, (1) co-conspirator Bugatti was not employed by a company called Intelligence Firm Tech, (2) co-conspirator Bugatti did not earn a monthly salary of \$11,000 from Intelligence Firm Tech, (3) there was no company named Intelligence Firm Tech located at 14416 Victory Blvd., Van Nuys, California,

1 (4) co-conspirator Bugatti had not worked at a company named
2 Intelligence Firm Tech for the previous six years and nine months,
3 and (5) co-conspirator Bugatti had not purchased a 2008 Mercedes-Benz
4 S Class Sedan.

COUNT FIFTEEN

[18 U.S.C. § 1014]

On or about November 19, 2012, in Los Angeles County, within the Central District of California, defendants TURHAN LEMONT ARMSTRONG, also known as ("aka") "T," aka "Turner Lemont Walker," aka "Emmett Louis," aka "Kent Warden," aka "Bob Jimenez," aka "Terrence" ("ARMSTRONG"), and FNU LNU, aka "Mike," aka "Mounir," ("MIKE"), together with co-conspirator Antonio Bugatti ("Bugatti"), and others known and unknown to the Grand Jury, knowingly made and caused to be made false statements for the purpose of influencing the actions of a financial institution, namely, US Bank, in connection with an application to obtain a \$50,000 loan on behalf of Krystal Royal Motors, to wit: defendants ARMSTRONG and MIKE and co-conspirator Bugatti submitted and caused to be submitted to US Bank a statement that represented (1) that co-conspirator Bugatti was employed by Intelligence Firm Tech, (2) that conspirator Bugatti earned a salary of \$132,000 from Intelligence Firm Tech in 2011, (3) that Intelligence Firm Tech was located at 14416 Victory Blvd., Van Nuys, California, and (4) that the loan would fund co-conspirator Bugatti's purchase of a 2012 Mercedes Benz 550 from Krystal Royal Motors, when in truth and in fact, as defendants ARMSTRONG and MIKE and co-conspirator Bugatti then well knew, (1) co-conspirator Bugatti was not employed by a company called Intelligence Firm Tech, (2) co-conspirator Bugatti had not earned a salary of \$132,000 from Intelligence Firm Tech in 2011, (3) there was no company named Intelligence Firm Tech located at 14416 Victory Blvd., Van Nuys, California, and (4) co-conspirator Bugatti had not purchased a 2012 Mercedes Benz 550 from Krystal Royal Motors.

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COUNT SIXTEEN

[18 U.S.C. § 1014]

On or about November 21, 2012, in Los Angeles and Riverside Counties, within the Central District of California, defendants TURHAN LEMONT ARMSTRONG, also known as ("aka") "T," aka "Turner Lemont Walker," aka "Emmett Louis," aka "Kent Warden," aka "Bob Jimenez," aka "Terrence" ("ARMSTRONG"), and FNU LNU, aka "Mike," aka "Mounir," ("MIKE"), together with co-conspirator Antonio Bugatti ("Bugatti"), and others known and unknown to the Grand Jury, knowingly made and caused to be made false statements for the purpose of influencing the actions of a financial institution, namely, Altura Credit Union, in connection with an application to obtain a \$50,000 loan on behalf of Krystal Royal Motors, to wit: defendants ARMSTRONG and MIKE and co-conspirator Bugatti submitted and caused to be submitted to Altura Credit Union a statement that represented (1) that co-conspirator Bugatti was employed by Intelligence Firm Tech, (2) that co-conspirator Bugatti earned a monthly gross income of \$13,019.15 from Intelligence Firm Tech, (3) that Intelligence Firm Tech was located at 14416 Victory Blvd., Van Nuys, California, (4) that co-conspirator Bugatti had worked at Intelligence Firm Tech for six years, and (5) that the loan would fund co-conspirator Bugatti's purchase of a 2011 Infiniti QX56, Vehicle Identification Number ending in -0580, when in truth and in fact, as defendants ARMSTRONG and MIKE and co-conspirator Bugatti then well knew, (1) co-conspirator Bugatti was not employed by a company called Intelligence Firm Tech, (2) co-conspirator Bugatti did not earn a monthly gross income of \$13,019.15 from Intelligence Firm Tech, (3) there was no company named Intelligence Firm Tech located at 14416 Victory Blvd.,

1 Van Nuys, California, (4) co-conspirator Bugatti had not worked at a
2 company named Intelligence Firm Tech for the previous six years; and
3 (5) co-conspirator Bugatti had not purchased a 2011 Infiniti QX56,
4 Vehicle Identification Number ending in -0580.

COUNT SEVENTEEN

[18 U.S.C. § 1014]

On or about November 27, 2012, in Los Angeles County, within the Central District of California, defendants TURHAN LEMONT ARMSTRONG, also known as ("aka") "T," aka "Turner Lemont Walker," aka "Emmett Louis," aka "Kent Warden," aka "Bob Jimenez," aka "Terrence" ("ARMSTRONG"), and FNU LNU, aka "Mike," aka "Mounir," ("MIKE"), together with co-conspirator Antonio Bugatti ("Bugatti"), and others known and unknown to the Grand Jury, knowingly made and caused to be made false statements for the purpose of influencing the actions of a financial institution, namely, JP Morgan Chase Bank, in connection with an application to obtain a \$50,000 loan on behalf of Krystal Royal Motors, to wit: defendants ARMSTRONG and MIKE and co-conspirator Bugatti submitted and caused to be submitted to JP Morgan Chase Bank a statement that represented (1) that the loan would fund co-conspirator Bugatti's purchase of a 2008 Mercedes-Benz S Class Sedan, and (2) that co-conspirator Bugatti lived at 12215 Zelzah Avenue, Granada Hills, California, when in truth and in fact, as defendants ARMSTRONG and MIKE and co-conspirator Bugatti then well knew, (1) co-conspirator Bugatti had not purchased a 2008 Mercedes-Benz S Class Sedan, and (2) co-conspirator Bugatti did not live at 12215 Zelzah Avenue, Granada Hills, California.

COUNT EIGHTEEN

[18 U.S.C. § 1014]

On or about August 1, 2013, in Los Angeles County, within the Central District of California, defendants TURHAN LEMONT ARMSTRONG, also known as ("aka") "T," aka "Turner Lemont Walker," aka "Emmett Louis," aka "Kent Warden," aka "Bob Jimenez," aka "Terrence" ("ARMSTRONG"), and FNU LNU, aka "Mike," aka "Mounir," ("MIKE") knowingly made and caused to be made false statements for the purpose of influencing the actions of a financial institution, namely, Wells Fargo Bank, N.A., in connection with a consumer account application, to wit: defendants ARMSTRONG and MIKE submitted and caused to be submitted to Wells Fargo Bank, N.A., a statement that represented (1) that the accountholder was named "Ely Moore" and (2) that the accountholder's social security number was XXX-XX-9992, when in truth and in fact, as defendants ARMSTRONG and MIKE then well knew, (1) the accountholder's name was not "Ely Moore" and (2) the accountholder's social security number was not XXX-XX-9992.

COUNT NINETEEN

[18 U.S.C. § 1956(h)]

A. OBJECTS OF THE CONSPIRACY

Beginning on a date unknown and continuing to on or about August 9, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendants TURHAN LEMONT ARMSTRONG, also known as ("aka") "T," aka "Turner Lemont Walker," aka "Emmett Louis," aka "Kent Warden," aka "Bob Jimenez," aka "Terrence" ("ARMSTRONG"), and FNU LNU, aka "Mike," aka "Mounir," ("MIKE"), and others known and unknown to the Grand Jury, conspired and agreed with each other to knowingly and intentionally commit the following offenses against the United States:

1. Knowing that property involved in a financial transaction represented the proceeds of some form of unlawful activity, and which property was, in fact, the proceeds of specified unlawful activity, namely, financial institution fraud, in violation of Title 18, United States Code, Section 1344, conducted and attempted to conduct financial transactions affecting interstate and foreign commerce knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

2. Knowingly engage and attempt to engage in monetary transactions involving criminally derived property of a value greater than \$10,000, which property represented the proceeds of specified unlawful activity, namely, financial institution fraud, in violation of Title 18, United States Code, Section 1957(a).

1 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
2 ACCOMPLISHED

3 The objects of the conspiracy were to be accomplished, in
4 substance, as follows:

5 1. Defendants ARMSTRONG and MIKE would cause bank accounts to
6 be opened under false names and identifying information to be used as
7 funnel accounts, that is, bank accounts into which they would deposit
8 and withdraw proceeds derived from bank fraud so as to conceal and
9 disguise the nature, location, source, ownership, and control of the
10 proceeds.

11 2. Defendant ARMSTRONG would deposit proceeds derived from
12 bank fraud into the funnel accounts.

13 3. Defendants ARMSTRONG and MIKE would withdraw the
14 fraudulently obtained funds from the funnel accounts, including
15 through cash withdrawals, check cashing, and deposits into further
16 accounts under the control of defendants ARMSTRONG and MIKE.

17 C. OVERT ACTS

18 In furtherance of the conspiracy, and to accomplish its objects,
19 defendants ARMSTRONG and MIKE, together with others known and unknown
20 to the Grand Jury, on or about the dates set forth below, committed
21 and caused to be committed various overt acts, in the Central
22 District of California and elsewhere, including, but not limited to,
23 the following:

24 1. On March 23, 2011, defendants ARMSTRONG and MIKE caused
25 bank account number xxxxxx7792 to be opened with Wells Fargo Bank,
26 N.A., under the name "Kevin M. Rios" (the "Kevin Rios account"),
27 listing social security number XXX-XX-5640.

1 2. On August 7, 2012, defendants ARMSTRONG and MIKE caused
2 bank account number xxxxxxxx4937 (the "Master Auto Sales account") to
3 be opened with Bank of America, N.A., on behalf of business "Master
4 Auto Sales, LLC," under the name "Kent Warden."

5 3. On August 13, 2012, defendant ARMSTRONG deposited a check
6 for \$30,000, obtained by fraud, from State Farm Bank into the Master
7 Auto Sales account.

8 4. On August 23, 2012, defendants ARMSTRONG and MIKE caused
9 bank accounts xxxxxx3677 and xxxxxx5513 to be opened with Wells Fargo
10 Bank, N.A., on behalf of business "Krystal Royal Motors," listing
11 taxpayer identification number 45-5560215.

12 5. On September 4, 2012, defendant ARMSTRONG deposited a check
13 for \$40,000, obtained by fraud, from State Farm Bank into the Master
14 Auto Sales account.

15 6. On September 21, 2012, defendant ARMSTRONG deposited a
16 check for \$40,000, obtained by fraud, from State Farm Bank into the
17 Master Auto Sales account.

18 7. On August 1, 2013, defendants ARMSTRONG and MIKE caused
19 bank account number xxxxxx7022 to be opened with Wells Fargo Bank,
20 N.A., under the name "Ely Moore" (the "Ely Moore account"), listing
21 social security number XXX-XX-9992.

22 8. On September 3, 2014, defendants ARMSTRONG and MIKE caused
23 bank account xxxxxx5601 to be opened with Wells Fargo Bank, N.A.,
24 under the name "Tracy Lang" (the "Tracy Lang account") listing social
25 security number XXX-XX-2245.

26 9. On September 23, 2014, defendant ARMSTRONG deposited a
27 check for \$55,000, obtained by fraud, from Navy Federal Credit Union
28 into the Ely Moore account.

1 10. On September 25, 2014, defendants ARMSTRONG and MIKE caused
2 a check for \$50,000, obtained by fraud from USAA to be deposited into
3 the Kevin Rios account.

4 11. On September 29, 2014, defendants ARMSTRONG and MIKE caused
5 a check for \$4,200 from the Ely Moore account and written out to
6 "Yorui Papan" to be paid to Merchants Bank of California, N.A. from
7 the Ely Moore account.

8 12. On September 29, 2014, defendants ARMSTRONG and MIKE caused
9 a check for \$4,500 from the Ely Moore account and written out to
10 "Joel Crespo" to be paid to Merchants Bank of California, N.A.

11 13. On October 7, 2014, defendants ARMSTRONG and MIKE caused a
12 check for \$50,000, obtained by fraud, from Pentagon Federal Credit
13 Union to be deposited into the Tracy Lang account.

14 14. On October 7, 2014, defendants ARMSTRONG and MIKE caused a
15 check for \$4,800 from the Ely Moore account and written out to
16 "Israel Yanir" to be paid to Merchants Bank of California, N.A.

17 15. On October 28, 2015, defendants ARMSTRONG and MIKE caused a
18 check for \$4,800 from the Ely Moore account and written out to
19 "Grayson Deloney" to be paid to Wilshire Bank, N.A.

20 16. On October 29, 2015, defendants ARMSTRONG and MIKE caused a
21 check for \$4,700 from the Ely Moore account and written out to
22 "Mohammad Ariuasil" to be paid to Wilshire Bank, N.A.

23 17. On December 24, 2015, defendants ARMSTRONG and MIKE caused
24 a check for \$4,850 from the Kevin Rios account and written out to
25 "Itamar Asolin" to be paid to Wilshire Bank, N.A.

26 18. On December 24, 2015, defendants ARMSTRONG and MIKE caused
27 a check for \$4,950 from the Kevin Rios account and written out to
28 "Adina Antebi" to be paid to Wilshire Bank, N.A.

1 19. On December 31, 2015, defendants ARMSTRONG and MIKE caused
2 \$4,600 in cash to be withdrawn from the Kevin Rios account via
3 Wilshire Bank, N.A.

4 20. On April 15, 2016, defendants ARMSTRONG and MIKE caused a
5 check for \$2,450 from the Ely Moore account and written out to "Eyal
6 Keinan" to be paid to Wilshire Bank, N.A.

7 21. On April 16, 2016, defendants ARMSTRONG and MIKE caused a
8 check for \$2,450 from the Ely Moore account and written out to "Beryl
9 Yosef Till" to be paid to Wilshire Bank, N.A.

10 22. On May 6, 2016, defendants ARMSTRONG and MIKE caused a
11 check for \$2,275 from the Ely Moore account and written out to "Beryl
12 Yosef Till" to be paid to Wilshire Bank, N.A.

13 23. May 21, 2016, defendants ARMSTRONG and MIKE caused a check
14 for \$2,400 from the Kevin Rios account and written out to "Ben
15 Pariente" to be paid to Wilshire Bank, N.A.

16 24. On October 14, 2016, defendant MIKE deposited \$2,500 in
17 cash into the Ely Moore account at a branch in Toluca Lake,
18 California.

COUNTS TWENTY TO THIRTY-FIVE

[18 U.S.C. § 1956(a)(1)(B)(i)]

On or about the following dates, in Los Angeles County, within the Central District of California, and elsewhere, defendants TURHAN LEMONT ARMSTRONG, also known as ("aka") "T," aka "Turner Lemont Walker," aka "Emmett Louis," aka "Kent Warden," aka "Bob Jimenez," aka "Terrence," and FNU LNU, aka "Mike," aka "Mounir," ("MIKE"), and others known and unknown to the Grand Jury, conducted and attempted to conduct the following financial transactions affecting interstate and foreign commerce, knowing that the property involved in such transactions represented the proceeds of some form of unlawful activity, and which transactions, in fact, involved the proceeds of specified unlawful activity, that is, bank fraud, in violation of Title 18, United States Code, Section 1344, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of such proceeds:

COUNT	DATE	TRANSACTION
TWENTY	8/13/2012	Deposit of check in the amount of \$30,000 from State Farm Bank into Bank of America account number xxxxxxxx4937 in the name of "Master Auto Sales"
TWENTY-ONE	9/4/2012	Deposit of check in the amount of \$40,000 from State Farm Bank into Bank of America account number xxxxxxxx4937 in the name of "Master Auto Sales"
TWENTY-TWO	9/21/2012	Deposit of check in the amount of \$40,000 from State Farm Bank into Bank of America account number xxxxxxxx4937 in the name of "Master Auto Sales"
TWENTY-THREE	9/23/2014	Deposit of check in the amount of \$55,000 from Navy Federal Credit Union into Wells Fargo Bank, N.A., account number xxxxxx7022 in the name of "Ely Moore"

COUNT	DATE	TRANSACTION
TWENTY-FOUR	9/25/2014	Deposit of check in the amount of \$50,000 from USAA into Wells Fargo Bank, N.A., account number xxxxxx7792 in the name of "Kevin Rios"
TWENTY-FIVE	9/29/2014	Check for \$4,200 from Wells Fargo Bank, N.A., account number xxxxxx7022 addressed to "Yorui Papan" and paid to Merchants Bank of California, N.A.
TWENTY-SIX	9/29/2014	Check for \$4,500 from Wells Fargo Bank, N.A., account number xxxxxx7022 addressed to "Joel Crespo" and paid to Merchants Bank of California, N.A.
TWENTY-SEVEN	10/28/2015	Check for \$4,800 from Wells Fargo Bank, N.A., account number xxxxxx7022 addressed to "Grayson Deloney" and paid to Wilshire Bank, N.A.
TWENTY-EIGHT	10/29/2015	Check for \$4,700 from Wells Fargo Bank, N.A., account number xxxxxx7022 addressed to "Mohammad Ariuasil" and paid to Wilshire Bank, N.A.
TWENTY-NINE	12/24/2015	Check for \$4,850 from Wells Fargo Bank, N.A., account number xxxxxx7792 addressed to "Adina Antebi" and paid to Wilshire Bank, N.A.
THIRTY	12/24/2015	Check for \$4,950 from Wells Fargo Bank, N.A., account number xxxxxx7792 addressed to "Joel Crespo" and paid to Wilshire Bank, N.A.
THIRTY-ONE	12/31/2015	Check for \$4,600 from Wells Fargo Bank, N.A., account number xxxxxx7792 made out to "cash" and paid to Wilshire Bank, N.A.
THIRTY-TWO	4/15/2016	Check for \$2,450 from Wells Fargo Bank, N.A., account number xxxxxx7022 addressed to "Eyal Keinan" and paid to Wilshire Bank, N.A.
THIRTY-THREE	4/16/2016	Check for \$2,450 from Wells Fargo Bank, N.A., account number xxxxxx7022 addressed to "Beryl Yosef Till" and paid to Wilshire Bank, N.A.
THIRTY-FOUR	5/6/2016	Check for \$2,275 from Wells Fargo Bank, N.A., account number xxxxxx7022 addressed to "Beryl Yosef Till" and paid to Wilshire Bank, N.A.
THIRTY-FIVE	5/21/2016	Check for \$2,400 from Wells Fargo Bank, N.A., account number xxxxxx7022 addressed to "Ben Pariente" and paid to Wilshire Bank, N.A.

COUNTS THIRTY-SIX TO FORTY

[18 U.S.C. § 1957(a)]

On or about the dates set forth below, in Los Angeles County, within the Central District of California, and elsewhere, defendant TURHAN LEMONT ARMSTRONG, also known as ("aka") "T," aka "Turner Lemont Walker," aka "Emmett Louis," aka "Kent Warden," aka "Bob Jimenez," aka "Terrence," knowing that the funds involved represented the proceeds of some form of unlawful activity, engaged, and willfully caused others to engage in, the following monetary transactions affecting interstate commerce, in criminally derived property of a value greater than \$10,000, which property, in fact, was derived from specified unlawful activity, that is, bank fraud, in violation of Title 18, United States Code, Section 1344:

COUNT	DATE	TRANSACTION
THIRTY-SIX	8/13/2012	Deposit of check in the amount of \$30,000 from State Farm Bank into Bank of America account number xxxxxxxx4937 in the name of "Master Auto Sales"
THIRTY-SEVEN	9/4/2012	Deposit of check in the amount of \$40,000 from State Farm Bank into Bank of America account number xxxxxxxx4937 in the name of "Master Auto Sales"
THIRTY-EIGHT	9/21/2012	Deposit of check in the amount of \$40,000 from State Farm Bank into Bank of America account number xxxxxxxx4937 in the name of "Master Auto Sales"
THIRTY-NINE	9/23/2014	Deposit of check in the amount of \$55,000 from Navy Federal Credit Union into Wells Fargo Bank, N.A., account number xxxxxx7022 in the name of "Ely Moore"
FORTY	9/25/2014	Deposit of check in the amount of \$50,000 from USAA into Wells Fargo Bank, N.A., account number xxxxxx7792 in the name of "Kevin Rios"

COUNT FORTY-ONE

[18 U.S.C. § 1028A(a)(1)]

Beginning on a date unknown and continuing to on or about August 9, 2017, in Los Angeles and Orange Counties, within the Central District of California, and elsewhere, defendants TURHAN LEMONT ARMSTRONG, also known as ("aka") "T," aka "Turner Lemont Walker," aka "Emmett Louis," aka "Kent Warden," aka "Bob Jimenez," aka "Terrence" ("ARMSTRONG"), and FNU LNU, aka "Mike," aka "Mounir," ("MIKE"), together with co-conspirators Chang Lee and Hyunwook Cho, and others known and unknown to the Grand Jury, knowingly possessed, transferred, and used, without lawful authority, means of identification that defendants ARMSTRONG and MIKE knew belonged to another person, that is, the social security numbers of victims I.B., J.L., J.A.G., C.S., T.A.W., and A.D.F., during and in relation to the offense of Conspiracy to Commit Financial Institution Fraud, a felony violation of Title 18, United States Code, Section 1349, as charged in Count One of this Indictment.

COUNT FORTY-TWO

[18 U.S.C. § 1028A(a)(1); 18 U.S.C. § 2(a)]

On or about August 1, 2013, in Los Angeles County, within the Central District of California, and elsewhere, defendants TURHAN LEMONT ARMSTRONG, also known as ("aka") "T," aka "Turner Lemont Walker," aka "Emmett Louis," aka "Kent Warden," aka "Bob Jimenez," aka "Terrence" ("ARMSTRONG"), and FNU LNU, aka "Mike," aka "Mounir," ("MIKE"), aiding and abetting one another, knowingly possessed, transferred, and used, without lawful authority, means of identification that defendants ARMSTRONG and MIKE knew belonged to another person, that is, the social security number of victim A.D.F., during and in relation to the offense of False Statement to a Federally Insured Financial Institution, a felony violation of Title 18, United States Code, Section 1014, as charged in Count Eighteen of this Indictment.

FORFEITURE ALLEGATION ONE

[18 U.S.C. § 981(a)(1)(C); 28 U.S.C. § 2461(c)]

Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given to defendants that the United States of America will seek forfeiture as part of any sentence pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction on Count One of this Indictment.

Each defendant convicted of the offense charged in Count One of this Indictment shall forfeit to the United States the following property:

a. All right, title and interest in any and all property, real or personal, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense;

b. Any property used or intended to be used to commit the offense; and

c. To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described above.

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), each defendant so convicted of the offense charged in Count One of this Indictment shall forfeit substitute property up to the total value of the property described above if, by any act or omission of said defendant, the property, or any portion thereof, (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially

1 diminished in value; or (e) has been commingled with other property
2 that cannot be divided without difficulty.

FORFEITURE ALLEGATION TWO

[18 U.S.C. §§ 982(a)(1) and 982(a)(2)]

Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence pursuant to Title 18, United States Code, Sections 982(a)(1) and (2)(A), in the event of any defendant's conviction on any of Counts Two through Forty of this Indictment.

Each defendant so convicted shall forfeit to the United States of America the following property:

a. All right, title and interest in any and all property, real or personal, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of any such offense;

b. Any property used or intended to be used to commit the offense; and

c. To the extent such property is not available for forfeiture, a sum of money equal to the total value of property described above.

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), each defendant so convicted shall forfeit substitute property, up to the total value of the property described above if, as the result of any act or omission of said defendant, the property, or any portion thereof, (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property that cannot be divided without difficulty.

FORFEITURE ALLEGATION THREE

[18 U.S.C. §§ 982(a)(2) and 1028(b)(5)]

Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence pursuant to Title 18, United States Code, Sections 982(a)(2) and 1028(b)(5), in the event of any defendant's conviction on either or both of Counts Forty-One or Forty-Two of this Indictment.

Each defendant so convicted shall forfeit to the United States the following property:

a. All right, title, and interest in any and all property, real or personal, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of any such offense;

b. Any property used or intended to be used to commit the offense; and

c. To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described above.

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(a)(2), each defendant so convicted shall forfeit substitute property up to the total value of the property described above if, by any act or omission of said defendant, the property, or any portion thereof, (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been

1 substantially diminished in value; or (e) has been commingled with
2 other property that cannot be divided without difficulty.

3
4 A TRUE BILL

5
6 /s/
7 Foreperson

8 SANDRA R. BROWN
9 Acting United States Attorney

10 

11 LAWRENCE S. MIDDLETON
12 Assistant United States Attorney
13 Chief, Criminal Division

14 KEVIN M. LALLY
15 Assistant United States Attorney
16 Chief, Organized Crime Drug
17 Enforcement Task Force Section

18 BENJAMIN R. BARRON
19 Assistant United States Attorney
20 Deputy Chief, Organized Crime Drug
21 Enforcement Task Force Section

22 ALEXANDER B. SCHWAB
23 Assistant United States Attorney
24 Organized Crime Drug Enforcement
25 Task Force Section
26
27
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